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By ECF and Email

April 22, 2015

The Honorable Katherine B. Forrest
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Peter Wengryn, et al. v. American Business Consultant Group Holding, LLC, et al.
Docket No.: 13-CV-4556 (VB)

Dear Judge Forrest:

This firm represents Defendants American Business Consultant Group Holding, LLC, J. Michael Kafes, Dennis Lee and Provision Corporation, LLC (“Defendants”), in the above-referenced action. I am respectfully requesting that the Court reconsider its ruling denying my request for a one-week extension of time to file responsive papers to Plaintiffs’ summary judgment motion until Monday, April 27.

I believe that I did not adequately explain the extenuating circumstances. I can assure the Court that I have been practicing law for 15 years and have never defaulted in motion practice. I take pride in my work and did not want to submit motion papers that were not near this firm’s standards. This has been an unusually difficult time personally and professionally as my family and I are struggling with the aftermath of my father’s sudden and unexpected passing in mid-February. I miscalculated the amount of time that would be necessary to respond, given the competing professional and personal obligations. Never once in my career did I ever decline to consent to another attorney’s request for an extension of a deadline.

I am only asking to be given until Monday to submit papers and I do not see how Plaintiffs can possibly be prejudiced by such an extension. In contrast, the import of the Court’s decision is that my clients, including the individual defendants who were not parties to the contracts at issue, are now responsible for a substantial sum to Plaintiffs, and cannot assert what I believe are colorable defenses and counterclaims to assert. Notwithstanding my failure in this case to meet the Court’s deadline and my shortcomings as an attorney in this instance, I do not believe my clients should suffer such severe consequences.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Eric Creizman

Eric M. Creizman, Esq.

cc: Valerie Fasolo, Esq. (by ECF and email)